

**RECEIVED**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

FEB 27 2024  
CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

STEPHEN A. ELEY Plaintiff(s),

vs.

Case No. 24 cv 531 SWB/TNL  
(To be assigned by Clerk of District Court)

BRICK SCHOOL

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in this lawsuit. Please attach additional sheets if necessary).

**COMPLAINT**

**PARTIES**

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name STEPHEN A. ELEY

Street Address 2100 BRYANT AVE. SO # 206

County, City HENNEPIN, MINNEAPOLIS

State & Zip Code MINNESOTA 55405

Telephone Number (612) 437-9591



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name BRECK SCHOOL  
Street Address 123 OTTAWA AVE. N.  
County, City HENNEPIN, GOLDEN VALLEY  
State & Zip Code MINNESOTA 55422

b. Defendant No. 2

Name DR. NATALIA HERNANDEZ  
Street Address 123 OTTAWA AVE. N.  
County, City HENNEPIN, GOLDEN VALLEY  
State & Zip Code MINNESOTA 55422

c. Defendant No. 3

Name MARY HEALY  
Street Address 123 OTTAWA AVE. N.  
County, City HENNEPIN, GOLDEN VALLEY  
State & Zip Code MINNESOTA 55422

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)



Federal Question



Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**

**Check here if additional sheets of paper are attached.** ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)



Defendant(s) reside in Minnesota



Facts alleged below primarily occurred in Minnesota



Other: explain

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. BRECK SCHOOL DISPERSED MY  
PHONE # TO A CERTAIN COONS RAPED POLICE  
OFFICER, IN TURN I RECIEVE, ~~AND~~ THREATS FROM  
SAID OFFICER. EASEDROPPING BY BRECK  
OFFICIALS ON CONVERSATION BETWEEN A FEMALE  
EMPLOYEE AND ~~MYSELF~~ MYSELF.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

#### REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

AN APOLOGY, VERBAL OR WRITTEN,  
IN ADDITION TO \$ 999,000 DOLLARS  
ONE million, NINE HUNDRED AND NINETY NINE  
DOLLARS.



Signed this 27 day of FEB 2024

Signature of Plaintiff

Stephane Clay

Mailing Address

2100 BRYANT AVE. SO  
# 206 NPLS MN 55405

Telephone Number

(652) 437-9591

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.